

# CATEGORY 1

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 PARRISH, J.V. Washington Public Power Supply System  
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 Records Management Branch (Document Control Desk)

SUBJECT: Forwards response to violations noted in insp rept  
 50-397/98-20. Corrective actions: air operator replaced & 4-  
 way pilot valve associated with floor drain cross-connect  
 valve FDR-V-609 cleaned.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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November 12, 1998  
GO2-98-194

Docket No. 50-397

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21,  
NRC INSPECTION REPORT 98-20, RESPONSE  
TO NOTICE OF VIOLATION**

- References:
- 1) Letter dated October 16, 1998, TP Gwynn (NRC) to JV Parrish (SS), "NRC Inspection Report 50-397/98-20 and Notice of Violation"
  - 2) Letter GO2-98-127, dated July 17, 1998, PR Bemis (SS) to NRC, "Licensee Event Report No. 98-011-00"
  - 3) Letter dated July 16, 1998, EW Merschoff (NRC) to JV Parrish (SS), "NRC Augmented Inspection of WNP-2 (NRC Inspection Report 50-397/98-16)"

The Supply System's response to the referenced Notice of Violation, pursuant to the provisions of Section 2.201, Title 10, Code of Federal Regulations, is enclosed as Attachment A.

The Supply System acknowledges Violation A (EA 98-452). The Supply System also agrees with the characterization and resolution of Violations B and C for which no response was required.

Should you have any questions or desire additional information regarding this matter, please call Mr. PJ Inserra at (509) 377-4147.

Respectfully,

JV Parrish (Mail Drop 1023)  
Chief Executive Officer

Attachment

cc: EW Merschoff - NRC RIV  
GA Pick - NRC RIV  
C Poslusny, Jr. - NRR

NRC Sr. Resident Inspector - 927N  
DL Williams - BPA/1399  
PD Robinson - Winston & Strawn

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# NRC INSPECTION REPORT 98-20, RESPONSE TO NOTICE OF VIOLATION

Attachment A

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## VIOLATION A

### Restatement of Violation

10 CFR 50.65(a)(1) states, in part, that holders of an operating license shall monitor the performance or condition of structures, systems, and components (SSC), as defined by 10 CFR 50.65(b), against licensee-established goals, in a manner sufficient to provide reasonable assurance that such SSCs are capable of fulfilling their intended functions. When the performance or condition of an SSC does not meet established goals, appropriate corrective action shall be taken.

10 CFR 50.65(a)(2) requires, in part, that monitoring as specified in 10 CFR 50.65(a)(1) is not required where it has been demonstrated that the performance or condition of an SSC is being effectively controlled through the performance of appropriate preventive maintenance, such that the SSC remains capable of performing its intended functions.

Contrary to 10 CFR 50.65(a)(2), as of July 10, 1996, the point in time that the licensee elected to not monitor the performance or condition of reactor building radioactive floor drain (FDR) sump cross-connect valves (FDR-V-607, -608, and -609) against licensee-established goals pursuant to the requirements of 50.65(a)(1), the licensee failed to demonstrate that the performance or condition of the valves was being effectively controlled through the performance of appropriate preventive maintenance, such that they remained capable of performing their intended function (i.e., common mode flooding mitigation). Preventive maintenance of the cross-connect valves was stopped in 1995 and Valve FDR-V-609, residual heat removal pump Room C and low pressure core spray pump room floor drain cross-connect, failed to perform its intended function during the June 17, 1998, flooding event.

This is a Severity Level IV violation (Supplement I) (50-397/9820-02).

### Response to Violation A

The Supply System accepts the violation.

### Reason for Violation A

The Supply System agrees with the staff's characterization of this event as given in the Violation and Report Details section of Inspection Report 50-397/98-20. The root cause was the failure of the Supply System Maintenance Rule expert panel to verify and validate that the information being used for exclusion from the Maintenance Rule monitoring program was correct and applicable to the decision criteria. The expert panel did originally consider the non safety related floor drain system's use in the emergency operating procedures (EOP) to be significant and in scope, but had not included the cross-connect valves. The fail safe design was thought sufficient to mitigate internal reactor building flooding.

## NRC INSPECTION REPORT 98-20, RESPONSE TO NOTICE OF VIOLATION

Attachment A

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### Corrective Actions Taken and Results Achieved

Immediate corrective action was taken to replace the air operator and clean the 4-way pilot valve associated with the floor drain cross-connect valve FDR-V-609. Additionally, the solenoid pilot valve (SPV) for all floor drain cross-connect valves (FDR-SPV-607 -608, and -609) were replaced and functional testing was performed to verify the valves automatically closed on a high sump level signal. These valves were administratively maintained in the closed position except when required for sump level control. When maintained closed, the cross-connect valves would not be required to be monitored under 10 CFR 50.65. These actions were completed prior to plant restart.

These valves were reevaluated to the criteria of 10 CFR 50.65(b)(2)(i) for inclusion in the Maintenance Rule scope. It was determined that exclusion based on the valves' fail safe design was inappropriate. Therefore, the valves meet the requirements for inclusion when maintained in the normally open position based on their significance in EOPs to mitigate a plant flooding transient. The Maintenance Rule monitoring program for these valves include quarterly operational testing to stroke and time the floor drain cross-connect valves, an annual test to calibrate and verify that the floor drain cross-connect valves stroke to their required isolation position upon receipt of a simulated or actual high sump level, and a periodic, ten year, replacement maintenance task for the solenoid pilot valves.

### Corrective Steps That Will Be Taken to Avoid Further Violations

The non safety related equipment being relied upon in the EOPs will be reevaluated to verify and validate that the basis for any equipment excluded from the Maintenance Rule monitoring program is in accordance with requirements.

### Date of Full Compliance

On September 22, 1998, the plant was in full compliance with 10 CFR 50.65(a)(2) when the Maintenance Rule expert panel approved the addition of the cross-connect floor drain valves to the Maintenance Rule scope and a maintenance monitoring program, in accordance with 10 CFR 50.65(a)(1), was established for FDR-V-607, -608, and -609.

